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Joy Riders Guilty of Conspiracy.—Louis Davis, a doctor's chauffeur, disregarded his instructions to put the automobile in the garage, and at about 12 o'clock one night went out for a spin with his chums, whom he met at a "blind tiger." The automobile, going at a rapid speed, 35 or 40 miles an hour, and wobbling from side to side, soon struck a horse and buggy, threw out the occupants, but fortunately without serious injury, and was itself badly wrecked. The defendants were sentenced to imprisonment for five years. This sentence was upheld by the Supreme Court of South Carolina in *State v. Davis*, 70 Southeastern Reporter, 811. Criminal conspiracy to use the automobile of another without his consent was one of the counts under which defendants were found guilty. The court holds that a criminal conspiracy is not restricted to unlawful acts which affect the community or public, as distinguished from the individual, a conspiracy being a combination of persons to accomplish a criminal or unlawful object, or an object neither criminal nor unlawful by criminal or unlawful means.

The "Patent Medicine" Case.—The United States Supreme Court has decided a "patent medicine case" in *Dr. Miles Medical Co. v. John D. Fark & Sons Co.*, 31 Supreme Court Reporter, 376. The Miles Co. is an Indiana corporation engaged in the manufacture and sale of proprietary medicines. It has been its practice to sell to jobbers and wholesale druggists, who in turn sell to retail druggists for sale to the customer. In the case of each remedy it has fixed not only the price of its own sales to jobbers, but also the wholesale and retail prices. To accomplish this result it has adopted two forms of restrictive agreements, limiting trade in the articles to those who become parties to one or the other. Defendant is a drug concern which has refused to enter into the required contract, and is charged with procuring medicines at cut prices, and thereby maliciously interfering with a contract between two parties and inducing one of them to break that contract. The principal question is as to the validity of the restrictive agreements. The contracts are skillfully drawn, and purport to appoint the party with whom made one of the Miles Company agents to receive goods for sale, the title thereto to remain in the company until sold in accordance with the provisions of the contract. The gist of these provisions is that the consignee must sell only to certain designated retail agents as specified in the lists furnished, and not to sell below a minimum price dictated by the Miles Company. The court holds that the agreements are in restraint of trade, and that a manufacturer cannot in the absence of statutory right, even though the restriction be known to purchasers, fix prices for further sales. Quoting the court: "The complainant having sold its products at prices satisfactory to itself,